

Facility: American Petroleum Environmental Service (APES) – WAR304161

## Post-Inspection Notes:

Typed on: (Date/Time)

### **A. Substantially Similar Outfall Determination**

Section S4.B.2.c. of the ISGP states that “the Permittee shall sample each distinct point of *discharge* off-site except as otherwise exempt from monitoring as a “*substantially identical discharge point*” per S3.B.5.b.”

*AND*

Section S3.B.5.b. of the ISGP states that the SWPPP sampling plan shall include the location of *discharge* points where “the Permittee does not sample applicable parameters because the *pollutant* concentrations are substantially identical to a discharge point being sampled” and... “reasons why the Permittee expects the *discharge* points to discharge

substantially identical effluents.”

## Ex. 5 - Deliberative Process

The facility includes multiple discharge points where sampling under the ISGP does not occur. I noted that the SWPPP monitoring plan does not indicate whether or why the permittee expects any of the discharge points to be substantially identical to the four catch basins where sampling occurs.

## Ex. 5 - Deliberative Process

### Inspection Notes:

Finished typing on: 4/1/2019 @ 10:30am

Inspection Date/Time: 3/28/2019 @ 8:55am → 10:22am

Weather: Sunny

Inspector(s): Matt Vojik, Jon Jones, Rachel Stephenson

Byron Jerome, Tacoma Branch Manager

EcoLube Recovery

401 E. Alexander Ave, Bldg 326

Tacoma, WA 98421

Email: [bjerome@ecoluberecovery.com](mailto:bjerome@ecoluberecovery.com)

Cell phone: Ex. 6 - Personal Privacy

Office phone: 253-300-3474

Paul stasch left

Adonia visited ~1 month ago

changed engineering firms - they're in communication with Ecology

Adonia issues: oil drips

10 trucks daily

vehicle maintenance inside

mobile mechanic comes

SBREFA

~0.4 acres

new EH&S

Byron - 1 decade with company, branch manager for 1 year

13 employees @ this location, 9 drivers, 1 warehouse person, 2 office personnel & manager

DBA APES - acquired APES sept 2017

used oil collector - pick up used oil / spent antifreeze

transfer facility --> larger trucks (transfer inside warehouse) - no interior drains - transfers happen over a temporary containment pad

antifreeze stored for 3-4 days

2 primary locations, satellite in Eugene, cover WA & OR

2 storm drains

Brakes, tires, galvanized siding, composite roof – could be source of zinc

Maul Foster (consulting company) sampled in the past

New company starts on Monday – Environ NW (?)

Monthly vacuum sweeping by Best – invoices available

No training Ex. 5 - Deliberative P

Signed / certified inspections **Ex. 5 - Deliberative Process**

No washing at facility

APES since winter 2015 – ship builder before that

OWS maintained by port

Neighboring facility was scrapping a barge

Sampling point = cage with filter sock, can be lifted out with a sampling tray underneath

Sheen at sampling drain Ex. 5 - Deliberative P

CB2 (not sampling point) – has a filter sock and a boom sock inside – each are switched on a monthly basis

CB1 – cage filter gets cleaned... is a sample at CB1 representative of a sample at CB2? – Ex. 5 - Deliberative  
(different BMPs)

Does SWPPP make substantially identical outfall determination? – Ex. 5 - Deliberative

Emailed SWPPP on day of the inspection

Change tires outside (for adequate space) – by 3<sup>rd</sup> party company

Monthly inspections go back to January 2018 (when Byron became branch manager)

1 lab report for a sampling event on 9/11/2018 Ex. 5 - Deliberative P (reports should be available on-site)

Report from Friedman & Bruya Environmental Chemists in Seattle

(could have double-checked the units on the lab report)

Ex. 5 - Deliberative high copper & zinc

Ex. 5 - Deliberative not sampling for TPH (provided Byron a copy of the transfer letter that mentions TPH)

Ex. 5 - Deliberative – change of sample point = corrective action? (and postponed engineering report? /

Corrective Action)

## Pre-Inspection Notes:

Informal Action - Letter	Complete	12/18/2018
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SIC 4731 FREIGHT TRANSPORTATION ARRANGEMENT

NAICS 484220 Specialized Freight (except Used Goods) Trucking, Local

(SIC 4731 is not specifically addressed in ISGP) – verify SIC at inspection

Per better business bureau:

<https://www.bbb.org/us/wa/tacoma/profile/industrial-recycling/american-petroleum-environment-inc-1296-22363052>

### ***American Petroleum Environment Inc***

Industrial Recycling

This company offers Petroleum recycling (full service) and HAZMAT transportation

ISGP coverage issued 5/31/16 per coverage letter

Surface Water Body 1 47.2782049485725 -122.410951202518 CB1 CB1 6/30/2017 Puget Sound Puget Sound

Water Body AA1 47.2782559005871 -122.411037033206 AA1 Discharge to Puget Sound Puget Sound Puget Sound

Site Contact Ecolube Recovery, LLC 401 E Alexander Ave Bldg 326 Tacoma WA 98421-4200  
Byron Jerome manager 401 E Alexander Ave - Bay # 10 TACOMA WA 98421

<https://www.ecoluberecovery.com/>

EcoLube Recovery (ELR) is a Northwest owned and operated company that has industry experienced field and management staff. With that you can trust in the best personalized service available in the Pacific Northwest. We are able to service our customers who span our geographic footprint with our knowledgeable, customer focused employees. We have a number of satellite service locations throughout the Pacific Northwest where we can aggregate used oil and other related waste for final recycling at our large re-refining plant in Portland, Oregon.

EcoLube Recovery (ELR), is an environmental services company that recently formed in September of 2017 by purchasing the assets of American Petroleum Environmental Service (APES), Inc. Formed in 2001, APES Inc. was a locally owned environmental services company providing a wide range of automotive and industrial environmental services throughout Washington, Oregon, Southern Idaho, and the lower mainland of British Columbia.

833-ECO-LUBE

SIC 4731 FREIGHT TRANSPORTATION ARRANGEMENT... per Stasch: American Petroleum Environmental Services (APES) - The facility was formerly owned by Mike Mazza but he informed me that it is under new ownership in Bellevue. The facility is at a Level III Corrective Action for 2017. No engineering report or waiver/time extension request was

submitted to Ecology and no stormwater treatment system installed. The facility is at a Level II Corrective Action thus far in 2018. The numbers of copper and zinc are abnormally high.

## ■ SIC to NAICS Code Mapping for "4731"

SIC CODE	NAICS CODE
4731 - Arrangement of Transportation of Freight and Cargo	488510 - Freight Transportation Arrangement
	541614 - Process, Physical Distribution, and Logistics Consulting Services

## ■ NAICS to SIC Code Mapping for "Specialized freight"

NAICS CODE	SIC CODE
484220 - Specialized Freight (except Used Goods) Trucking, Local	4212 - Local Trucking without Storage
	4214 - Local Trucking with Storage

Ex. 5 - Deliberative

- Per p.4 of ISGP – permit required if they have vehicle maintenance (for SIC 42xx)
- p. 25 of ISGP says they need to sample petroleum hydrocarbons in addition to standard parameters on p. 23 - DMRs/DMR data suggest they're not doing this
- late DMR submittal 2017Q2
- postponed CA due to change in sampling location (Q42017 DMR: This is the second sample collected from the updated sampling location (catch basin located near the south corner of the building). The level 1 corrective action for the 2017 third quarter zinc and copper exceedances consisted of increasing the sweeping frequency to three times per quarter. A level 2 corrective action will be performed as a result of the forth quarter zinc and copper exceedances.)
- Q3 2016 DMR: The employee that was responsible to pull the sample did not complete the task. **Maul Foster** has been hired to ensure we are in compliance moving forward.
- sheen observed once

Q12017 DMR: A level 1 corrective action for the 2016 4th quarter copper and zinc benchmark exceedance consisted of the installation of a catch basin insert and additional sweeping events by a 3rd party as well as the Port of Tacoma. The Port of Tacoma is conducting a source evaluation to determine where the metals could be coming from in preparation of the Level II. APES will continue the use and maintenance of BMP's and sweeping.

## Ex. 5 - Deliberative Process



CNE request was denied in 2016

**Q8 Do transportation facilities require permit coverage?**

**A8** Certain categories of transportation facilities (listed below) require permit coverage if they have vehicle maintenance activity, equipment cleaning operations, or airport deicing operations:

- Railroad Transportation (SIC 40xx)
- Local and Suburban Transit and Interurban Highway Passenger Transportation (SIC 41xx)
- Motor Freight Transportation (SIC 42xx, except SIC 4221–25)
- United States Postal Service (SIC 43xx)
- Water Transportation (SIC 44xx)
- Air Transportation (SIC 45xx)
- Petroleum Bulk Stations and Terminals (SIC 5171)

**Clarify the Corrective Action Level 2 deadline; do businesses get until Sept 30 of the following year if they exceed the same parameter twice during the same calendar year? Do they go straight to level 3 while still trying to implement Level 2?**

**A63** The deadline for completing Level 2 corrective actions is August 31st of the following year in which a permittee exceeds an applicable benchmark value (for a single parameter) for any two quarters during a calendar year. However, if a permittee exceeds an applicable benchmark value (for a single parameter) for any three quarters during a calendar year, the permittee must implement a Level 3 corrective action, instead of a Level 2.

**Note:** In cases where a permittee believes that a Level 2 (source control) corrective action has solved (or will solve) the problem causing the benchmark exceedances, they can request a waiver from installing additional treatment BMPs and completing the Level 3 corrective action.

**Q64 With multiple discharge locations (separate outfalls or even separate water bodies), can I be at different Corrective Action levels by exceeding different benchmarks for the separate drainage areas of my site?**

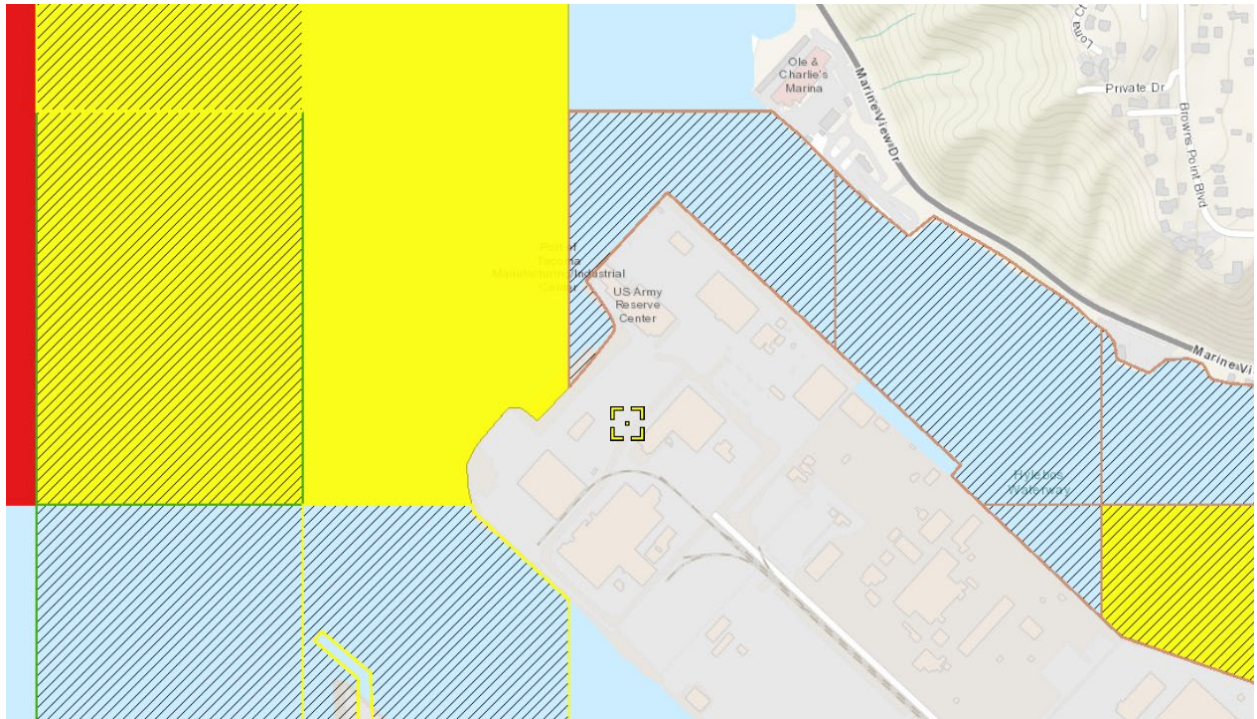
**A64** No, corrective actions are “parameter-specific”, but not “outfall-specific.” Example: if a facility exceeds the zinc benchmark at outfall 1 during the 1st quarter, exceeds the zinc benchmark at outfall 2 during the 2nd quarter, and then exceeds the zinc benchmark at outfall 3 during the 3rd quarter; they are required to complete a Level 3 corrective action for the zinc parameter.



**Definition:**

“Vehicle Maintenance” means the rehabilitation, mechanical repairing, painting, fueling, and/or lubricating of a motor-driven conveyance that transports people or freight, such as an automobile, truck, train, or airplane.

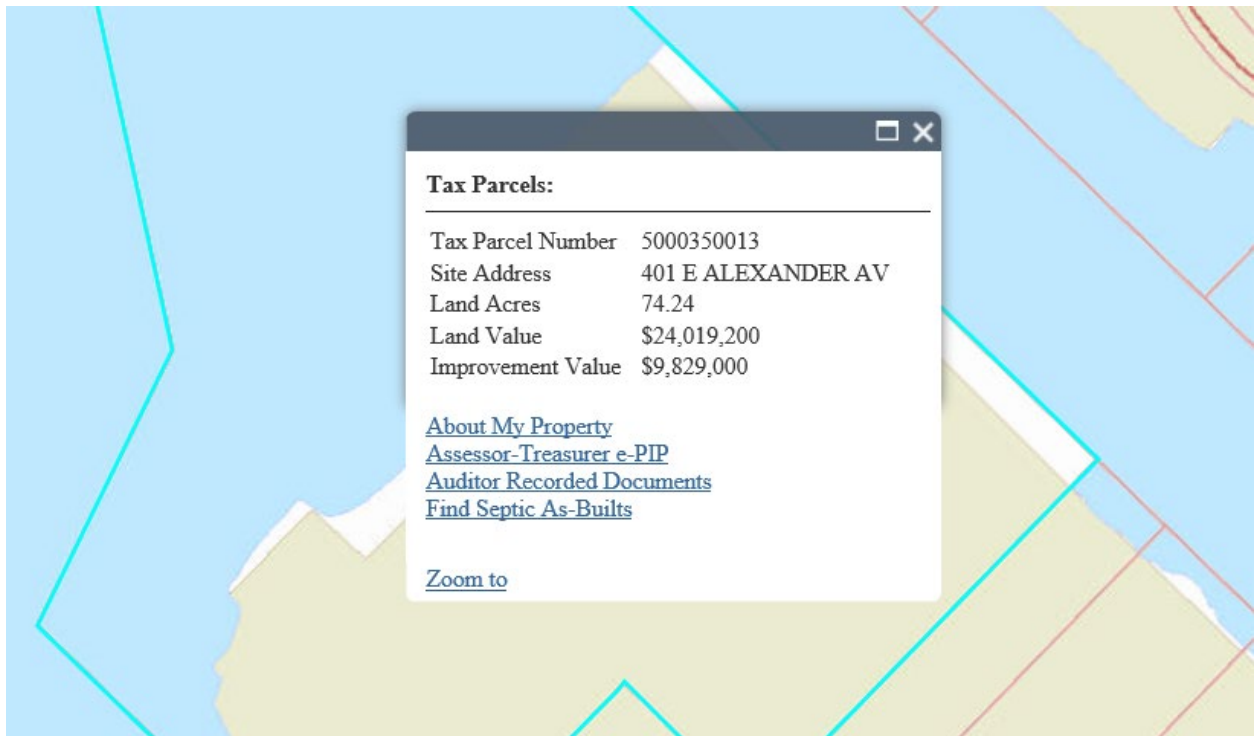




Yellow = category 1 for benzene

Stripes w/yellow border (SW) = category 2 for sediment bioassay

Stripes with brown border (NE) = category 4B for sediment bioassay



Search Results

03/26/2019 04:05 PM



1 record(s) found for parcel number 5000350013

Parcel	Type	Status	Taxpayer Name	Site Address	Pay Online
<a href="#">5000350013</a>	REAL	Active	PORT OF TACOMA	401 E ALEXANDER AV	

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